

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JOSEPH ANDREW HYLKEMA,

Plaintiff,

v.

MIDLAND CREDIT MANAGEMENT, INC.,
a Kansas corporation; CARLOS COLLINS
and JANE DOE COLLINS, husband and
wife and the marital communities thereof,
jointly and severally,

Defendants.

Case No. 2:12-cv-01652-RSM

**DECLARATION OF ROBERT E.
SABIDO IN SUPPORT OF UNOPPOSED
MOTION TO EXTEND DEADLINE TO
FILE FIRST APPEARANCE**

I, Robert E. Sabido, hereby declare:

1. I am one of the attorneys representing defendants in this case.
2. Defendants' first appearance currently is due on October 16, 2012.
3. An answer has been drafted but defendants need additional time to

finalize and file it.

4. Accordingly, defendants request that the court extend the deadline to file
their first appearance up to and including October 19, 2012.

5. My office has conferred with *pro se* plaintiff Joseph Hylkema, and he does
not oppose this requested extension.

6. This motion is made in good faith and not for any improper purpose.

**DECLARATION OF ROBERT E. SABIDO IN SUPPORT OF
UNOPPOSED MOTION TO EXTEND DEADLINE TO FILE
FIRST APPEARANCE - Page 1**

COSGRAVE VERGEER KESTER LLP
Attorneys
888 SW Fifth Avenue, Suite 500
Portland, OR 97204
(503) 323-9000

1 I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS
2 TRUE AND CORRECT.

3 DATED: October 16, 2012
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5 /s/ Robert E. Sabido
6 Robert E. Sabido
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**DECLARATION OF ROBERT E. SABIDO IN SUPPORT OF
UNOPPOSED MOTION TO EXTEND DEADLINE TO FILE
FIRST APPEARANCE - Page 2**

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CERTIFICATE OF SERVICE

I hereby certify that on October 16, 2012, I electronically filed the foregoing
**DECLARATION OF ROBERT E. SABIDO IN SUPPORT OF UNOPPOSED MOTION
TO EXTEND DEADLINE TO FILE FIRST APPEARANCE** with the Clerk of the Court
using the CM/ECF System which will send notification of such filing to the following:

Joseph Andrew Hylkema
1425 Broadway, #123
Seattle, WA 98122
Plaintiff *pro se*

DATED: October 16, 2012

/s/ Robert E. Sabido, WSBA No. 29170
Robert E. Sabido